UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

)
ALTAGRACIA PEGUERO,)
Plaintiff,)
v.)
AMERICAN EXPRESS COMPANY, THE SKLOVER GROUP, INC. and FEDERAL INSURANCE COMPANY,)))
Defendants.) Civil Action No. 05-10995-RCL
AMERICAN EXPRESS COMPANY,)
Third-Party Plaintiff,)
v.)
HEALTHEXTRAS, LLC,)
Third-Party Defendant.)
)

INITIAL DISCLOSURES OF THIRD-PARTY DEFENDANT HEALTHEXTRAS, INC.

Pursuant to Fed. R. Civ. P. 26(a)(1) and LR 26.2(A), third-party defendant HealthExtras, Inc. ("HealthExtras") makes these initial disclosures in the above-captioned case.

- A. Individuals Likely To Have Discoverable Information That HealthExtras May Use To Support Its Claims or Defenses
 - Joanna Ficklin
 Vice President of Sales Administration
 HealthExtras, Inc.
 800 King Farm Boulevard, 4th Floor
 Rockville, Maryland
 (301) 548-2900

Has information concerning (a) HealthExtras' contractual relationships with American Express Company ("Amex"), Federal Insurance

Company ("Federal") and the Sklover Group, Inc. ("Sklover"), and (b) HealthExtras' role in providing customer service, administration and fulfillment services with respect to the Accidental Disability Plan brokered by Sklover, underwritten by Federal, marketed by Amex and purchased by Altagracia Peguero ("Peguero").

2. Andrew J. Sklover

President The Sklover Group, Inc. 400 Post Avenue Westbury, New York (516) 333-6608

Has information concerning Sklover's role in brokering the Accidental Disability Plan at issue.

Kirk Voisin 3.

Vice President, Accident Benefits and Life Dept. Federal Insurance Company 15 Mountain View Road Warren, New Jersey telephone unknown

Has information concerning Federal's role in underwriting the Accidental Disability Plan at issue.

J. Whitney Stevens 4.

former Vice President of Marketing American Express Company address and telephone unknown

Has information concerning Amex's role in marketing the Accidental Disability Plan at issue.

5. Abby E. Mink

American Express Company address and telephone unknown

Has information concerning Amex's role in marketing the Accidental Disability Plan at issue.

6. Michelle L. Corn American Express Company address and telephone unknown

Has information concerning Amex's role in marketing the Accidental Disability Plan at issue.

7. Ellen M. Kirschner American Express Company address and telephone unknown

Has information concerning Amex's role in marketing the Accidental Disability Plan at issue.

Prudence P. Plummer 8. American Express Company address and telephone unknown

Has information concerning Amex's role in marketing the Accidental Disability Plan at issue.

9. Robin J. Madigan American Express Company address and telephone unknown

Has information concerning Amex's role in marketing the Accidental Disability Plan at issue.

10. Todd Lindamood American Express Company address and telephone unknown

Has information concerning Amex's role in marketing the Accidental Disability Plan at issue.

Susan Krahn 11. American Express Company address and telephone unknown

Has information concerning Amex's role in marketing the Accidental Disability Plan at issue.

12. Charlene L. Bryant
American Express Company
address and telephone unknown

Has information concerning Amex's role in marketing the Accidental Disability Plan at issue.

13. Wanda Martinez
American Express Company
address and telephone unknown

Has information concerning Amex's role in marketing the Accidental Disability Plan at issue.

- B. Description By Category And Location Of Documents In HealthExtras' Possession That It May Use To Support Its Claims Or Defenses
 - 1. Contracts between and among HealthExtras, Federal, Sklover and Amex <u>Location</u>: HealthExtras' offices in Rockville, Maryland
 - 2. Membership records concerning Accidental Disability Plan Location: HealthExtras' offices in Rockville, Maryland
 - 3. Communications between HealthExtras and Federal concerning their contract and their respective responsibilities thereunder <u>Location</u>: HealthExtras' offices in Rockville, Maryland
 - 4. Communications between HealthExtras and Amex concerning their contract and their respective responsibilities thereunder <u>Location</u>: HealthExtras' offices in Rockville, Maryland
 - Communications between HealthExtras and Amex evidencing Amex's review and approval of marketing materials for the Accidental Disability Plan <u>Location</u>: HealthExtras' offices in Rockville, Maryland
- C. Computation of Damages Claimed By HealthExtras and Disclosure of Documents on Which Computation is Based

HealthExtras does not presently claim damages against any other party.

D.	Disclosure of Insurance Agreement Under Which Insurer May Be Liable
	To Satisfy Judgment Against HealthExtras

None.

HEALTHEXTRAS, INC.

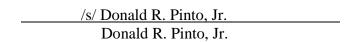
By its attorney,

/s/ Donald R. Pinto, Jr.
Donald R. Pinto, Jr., BBO No. 548421
RACKEMANN, SAWYER & BREWSTER
One Financial Center
Boston, Massachusetts 02111
(617) 542-2300

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.



Dated: May 26, 2006